

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CANDY M. SOUSA, On Behalf of Herself and All)	
Others Similarly Situated,)	Civil Case 3:04 cv 30022 MAP
)	
Plaintiff,)	
)	
v.)	
)	
WAVE SYSTEMS CORPORATION, JOHN E.)	
BAGALAY, JR., STEVEN K. SPRAGUE and)	
GERALD T. FEENEY,)	
)	
Defendants.)	

YOSEF STREICHER, on Behalf of Himself and All)	
Others Similarly Situated,)	Civil Case 3:04 cv 30026 MAP
)	
Plaintiff,)	
)	
v.)	
)	
WAVE SYSTEMS CORPORATION, JOHN E.)	
BAGALAY, JR., STEVEN K. SPRAGUE and)	
GERALD T. FEENEY,)	
)	
Defendants.)	

Additional Captions to Follow

**MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS
AND FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL**

RAFAT DAWOD,

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, STEVEN
SPRAGUE and GERALD T. FEENEY,

Defendants.

ALVIN CHESS, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, STEVEN K.
SPRAGUE and GERARD T. FEENEY,

Defendants.

MICHAEL VICKER, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, JOHN E.
BAGALAY, JR., STEVEN K. SPRAGUE and
GERARD T. FEENEY,

Defendants.

H. MARTIN BOHMAN, on Behalf of All Others
Similarly Situated,

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, STEVEN
SPRAGUE and GERALD T. FEENEY,

Defendants.

Civil Case 3:04 cv 30041 MAP

JIMMY SUO, on Behalf of himself and all others
similarly situated,

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, STEVEN
SPRAGUE and GERARD T. FEENEY,

Defendants.

Civil Case 3:04 cv 30042 MAP

**JACK SCHULMAN, Individually and On Behalf of All
Others Similarly Situated,**

Plaintiff,

V.

WAVE SYSTEMS CORPORATION, STEVEN
SPRAGUE and GERARD T. FEENEY,

Defendants.

Civil Case 3:04 cv 30043 MAP

Class members Barry B. Stoddard ("Stoddard") and Victor Rapp ("Rapp"), by their counsel, hereby move this Court for an Order: (i) consolidating the Actions; (ii) appointing Stoddard and Rapp as Lead Plaintiffs; (iii) approving Stoddard and Rapp's selection of the law firm of Cauley Geller Bowman & Rudman, LLP to serve as Lead Counsel and the law firm of Gilman and Pastor, LLP to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Stoddard and Rapp submit herewith a Memorandum of Law and Declaration of David Pastor dated April 2, 2004.

Dated: April 2, 2004

Respectfully submitted,

GILMAN AND PASTOR, LLP

By: /s/ David Pastor

David Pastor (BBO #391000)

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